

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ROBERT SHAW,)	
)	Civil Action No. 04-259E
Plaintiff,)	
)	Magistrate Judge Baxter
v.)	
)	
WALTER RHINEHART, Psy. D.)	Electronically Filed
HERBERT BEAM, M.D.)	
JAMES L. FLETCHER, M.D.)	
DENNIS OLSON, M.D.)	
VIOLETTE GEZA,)	
STEVEN LOBOZZI,)	
BONNIE SAYLOR,)	
JUDITH GLENN, and)	
CHARLES MONTGOMERY)	
)	
Defendants.)	

MOTION TO SEAL DEFENDANT'S EXHIBITS FILED IN
SUPPORT OF ITS MOTION TO DISMISS OR IN THE
ALTERNATIVE MOTION FOR SUMMARY JUDGMENT

AND NOW come the Defendants in the above-captioned case, by their attorneys, Mary Beth Buchanan, United States Attorney for the Western District of Pennsylvania, and Lee J. Karl, Assistant United States Attorney for the same District, and respectfully move the Court to issue an Order directing that Exhibits A and B filed in support of Defendants' Motion to Dismiss, or in the Alternative, Motion for Summary Judgement, be sealed pending further Order of Court.

In support of this Motion, it is respectfully submitted that disclosure of the information in Exhibits A and B would violate Plaintiff's right to privacy, as Plaintiff's medical records are included with the Exhibits.

WHEREFORE, Defendants, Walter Rhinehart, Herbert Beam, James Fletcher, Dennis Olson, Violette Geza, Steven LaBozzi, Bonnie Saylor, Judith Glenn and Charles Montgomery, respectfully request that the Court issue an Order directing that Exhibits A and B filed in support of Defendants' Motion to Dismiss, or in the Alternative, Motion for Summary Judgement, be sealed pending further Order of Court.

Dated: November 21, 2005

Respectfully Submitted,
MARY BETH BUCHANAN
UNITED STATES ATTORNEY

s/ Lee J. Karl
LEE J. KARL
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Defendants' Motion to Seal was served via First Class U.S. Mail on this 21st day of November, 2005, upon the following:

Robert Shah
22455 Carlisle
Dearborn, MI 48124

s/ Lee J. Karl
Lee J. Karl
Assistant U.S. Attorney